

1 ADAM GANZ, ESQ.
Nevada Bar No. 6650
2 Aganz@ganzhauf.com
MARJORIE L. HAUF, ESQ.
3 Nevada Bar No. 8111
Mhauf@ganzhauf.com
4 MELANIE L. THOMAS, ESQ.
Nevada Bar No. 12576
5 Mthomas@ganzhauf.com
GANZ & HAUF
6 8950 W. Tropicana Ave., Suite 1
Las Vegas, Nevada 89147
7 Tel: (702) 598-4529
Fax: (702) 598-3626
8 *Attorneys for Plaintiffs*

-00o-

9
10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SUSAN HOY as Special Administrator of the
ESTATE OF A.D.J., a male minor (November
13 17, 2003 - April 25, 2017), and SUSAN HOY as
Guardian Ad Litem of A.B.J., a female minor,
14 (December 21, 2005), DIJONAY THOMAS,
individually and as heir to A.D.J.,

CASE NO.: 2:18-cv-01403-RFB-GWF

15 Plaintiffs,

16 v.

17 PAUL D. JONES, individually; CAROLE
FALCONE, individually and in her official
18 capacity; PAULA HAMMACK, individually and
in her official capacity; COUNTY OF CLARK, a
19 political subdivision of the State of Nevada;
DOES I-X, individuals; and ROE
20 CORPORATIONS I-X; DOE CLARK
COUNTY DEPARTMENT OF FAMILY
SERVICES EMPLOYEES XI-XXX;
21 individually and in their official capacities;
BOULDER II DE, LLC, a Delaware Limited
Liability Company dba SIEGEL SUITES
22 BOULDER 2; THE SIEGEL GROUP
NEVADA, INC., A Domestic Corporation, dba
THE SIEGEL GROUP; BOULDER II LV
HOLDINGS, LLC, A Nevada Limited Liability
23 Company; DOE EMPLOYEE SIEGEL SUITES
I-X,

24 Defendants.

25
26 STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO DEFENDANTS COUNTY OF
CLARK, CAROLE FALCONE AND
PAULA HAMMACK'S MOTION FOR
SUMMARY JUDGMENT

27
28 (FIRST REQUEST)

COMES NOW SUSAN HOY as Special Administrator of the ESTATE OF A.D.J., a male
minor 17, 2003 - April 25, 2017), and SUSAN HOY as Guardian Ad Litem of A.B.J., a female

1 minor, (December 21, 2005), DIJONAY THOMAS, individually and as heir to A.D.J. and C
2 CAROLE FALCONE, individually and in her official capacity; PAULA HAMMACK, individually
3 and in her official capacity; COUNTY OF CLARK, a political subdivision of the State of Nevada;
4 by and through their respective counsel of record and hereby stipulate to extend the time for
5 Plaintiffs to file their response to **Defendants, County of Clark, Carole Falcone and Paula**
6 **Hammack's Motion for Summary Judgment (ECF No.: 41.)**

7
8 Plaintiffs' response is currently due on August 23, 2019. Plaintiffs' counsel was in a motor
9 vehicle crash on August 20, 2019. Therefore, Plaintiffs have good cause to request an extension of
10 time until Friday, August 30, 2019, seven (7) days after the response would otherwise be due.

11 Defendants' Reply to Plaintiffs' response will be due on 9/20/19.
12
13 ...
14 ...
15 ...
16 ...
17 ...
18 ...
19 ...
20 ...
21 ...
22 ...
23 ...
24 ...
25 ...
26 ...
27
28

This is Plaintiffs' first request for an extension and this stipulation is submitted in good faith without the purpose of undue delay.

Dated this 22nd day of August 2019.

Dated this 22nd day of August 2019.

GANZ & HAUF

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

/s/ Marjorie Hauf, Esq.

/s/ *Felicia Galati, Esq.*

MARJORIE HAUF ESQ.
Nevada Bar No. 8111
MELANIE L. THOMAS, ESQ.
Nevada Bar No. 12576
8950 W. Tropicana Ave. #1
Las Vegas, NV 89147
Attorney for Plaintiffs

FELICIA GALATI, ESQ.
Nevada Bar No. 7341
9950 w. Cheyenne Ave.
Las Vegas, NV 89129
Attorney for Defendants

IT IS SO ORDERED.

Dated this 23 day of August, 2019.

Eayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE